

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

BILLY HILL

Plaintiff,

VS.

**RARE HOSPITALITY
MANAGEMENT, LLC DBA
LONGHORN STEAKHOUSE,
DAVID WILLIAMS** in his/her/their
professional capacity, and **JOHN
DOES NOS 1-10**, whether singular
or plural, masculine or feminine,
individuals or corporations, who are
not known at this time, but will be
added by amendment when
ascertained.

Defendant(s).

CIVIL ACTION NO. ^{23A00559}

NOTICE OF 30(B)(6) DEPOSITION

COMES NOW Billy Hill, by and through undersigned counsel of record,
and files this Notice of a 30(b)(6) Deposition, and respectfully shows this
Honorable Court as follows:

1.

Pursuant to 9-11-30(b)(6) and/or F.R.C.P. 30(b)(6), Plaintiff hereby requests
that the Defendant, RARE Hospitality Management, LLC dba LongHorn
SteakHouse, provide a witness to submit to a deposition who can testify on behalf

Billy Hill v. RARE Management Hospitality Management, LLC dba Longhorn Steakhouse et. al.,
DeKalb County State Court
Notice of 30(b)(6) Deposition

of the company on policies and procedures relating to the information submitted in Exhibit A, attached herinto.

2.

As opposed to unilaterally setting a date and time for such deposition, Plaintiff requests that counsel for the Defendant propose a mutually agreeable time and place for such a deposition. This notice is simply to provide the Defendant with advance notice of the topics that will be the subject of a deposition at a future time.

Executed today, February 3, 2023.

DOZIER LAW FIRM, LLC



David Thomas Dorer
Georgia Bar No.: 934408

Attorney for Billy Hill

STATE COURT OF
DEKALB COUNTY, GA.
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E-FILED
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**EXHIBIT
A**

The Witness to testify in the 30(b)(6) motion shall provide information on the following:

- 1) Policies and procedures for maintaining a safe premises at the location of the incident giving rise to the complaint for damages.
- 2) Policies and procedures on hiring processes for employees at the location of the incident giving rise to the complaint for damages
- 3) Policies and procedures for training of employees at the location of the incident giving rise to the complaint for damages
- 4) Policies and procedures for disciplining employees that fail to follow policies and procedures for maintaining a safe premises at the location of the incident giving rise to the complaint for damages.